

# COMPLAINT

(for filers who are prisoners without lawyers)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Michelle Mae Green  
Kevin M. Robinson

v.

Case Number:

(Full name of defendant(s))

Michelle Mae Green  
Milwaukee County Jail

(to be supplied by Clerk of Court)

### A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at  
(State)

Dodge Correctional Institution / Incident occurred at 949 n 9th  
St. Milw, WI C.J.  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Michelle Green / Milwaukee County Jail  
(Name)

is (if a person or private corporation) a citizen of \_\_\_\_\_  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Milwaukee County Jail Facility  
449 n. 9th St. Milwaukee, WI 53233  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

During my stay at MCJF  
On or about Dec 18 2017 - 12-29-18 during the  
course of my trial I was in pod 5D cell 40/9 and  
around 9-10:30<sup>pm</sup> I started receiving visits to my door  
& bag lunches & I was requested by C.O Michelle  
Green to undress in front of my celly & masturbate  
until completion. This carried on 6 months out of my  
12 month stay any time Michelle worked a 5th-floor  
3rd shift she keep me up into the wee hours of  
the morning conditioning me to parade around naked.  
She also would bring me a roll of tissue with her under

garments wrapped in the middle of the roll of tissue, on a few occasions she would have me stand at the door, naked while she opened it & reached in to hand me a bag lunch or roll of tissue upon where she would wipe my penis & close the door, she wrote me dirty letters, & passed & sent me cards thru the mail initially these advances were unwanted but then I began to give in, only to later find out I was used & Michelle does this to multiple guys. I believe if nothing the county jail was aware of her frequent visits to my cell & her fraternizing behavior.

I wasn't aware that this kind of behavior could warrant a prea violation due to the fact Milwaukee County Jail does not orientate inmates about the prea policy. I feel distraught, used & taken advantage of. I once consider speaking to an lieutenant but he said if I confided I would be placed in solitary confinement under Criminal Investigation. I also have several facets of pool, letters cards & phone conversations. During the course of this abuse I was afraid for my safety. Michelle threatened to place me in segregation if I didn't comply. I have not taken note of all dates & times but the following are a few that come to mind.

2-25-18 8:00-10:00 Feb. 20th/21st 7:00a.m - 8:00a.m

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I am requesting to be awarded money & that Milwaukee County Jail Facility, create a new policy to help orientate inmates about prea & its affects. Ways to go about making a complaint. I was in the dark about the prea policy & feel there may be more people exactly like me in the Milwaukee County Jail. Being sexually harassed I don't know how to come forth about it. There should also be a more strict non-fraternizing policy to protect inmates from unwanted advances by Correctional officer's.

E. JURY DEMAND

I want a jury to hear my case.


☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 15th day of May 2018.

Respectfully Submitted,

  
Signature of Plaintiff

521626  
Plaintiff's Prisoner ID Number

Dodge Correctional Institution  
P.O. Box 700 Waupun, WI 53963  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.